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Attorneys for Defendant
Bill Ginsburg

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STRIKE HOLDINGS, LLC,

Plaintiff,

v.

BILL GINSBURG

Defendant.

Civil Action No. 08 CV 7302

ECF Case

**NOTICE OF DEFENDANT'S
MOTION TO DISMISS**

PLEASE TAKE NOTICE that upon the Verified Complaint, dated June 11, 2008; the Memorandum of Law, dated August 25, 2008; and the Declaration of Bill Ginsburg in support thereof, the undersigned counsel for Defendant Bill Ginsburg moves this Court for an order dismissing the Verified Complaint, under the provisions of Federal Rule of Civil Procedure 12(b)(2) because Defendant is not subject to the personal jurisdiction of this Court.

PLEASE TAKE FURTHER NOTICE that pursuant to 28 U.S.C. § 1404(a) or 1406(a), if the Court does not dismiss the case, Defendant alternatively moves to transfer this matter to the United States District Court for the Southern District of Florida.

Dated: New York, New York
August 25, 2008

MORRISON & FOERSTER LLP

By: /s/ J. Alexander Lawrence

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